

EXHIBIT C



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CLIENT/MATTER NUMBER
100845-0402

June 30, 2023

Via Email

Brent Weisenberg, Esq.
LOWENSTEIN SANDLER LLP
One Lowenstein Drive
Roseland, NJ 07068
Email: bweisenberg@lowenstein.com

Re: *In re The Roman Catholic Bishop of Oakland*
Case No. 23-40523 WJL (Bankr. N.D. Cal.)

Dear Brent:

I write in response to your June 26, 2023, letter sent on behalf of the Official Committee of Unsecured Creditors requesting that my client, the Roman Catholic Bishop of Oakland (the "Debtor" or "Bishop"), produce certain categories of documents concerning "the allegations made against the [two] Employed Accused Priests and the Bishop's response to the same", which employees were referenced, but not identified by name, by a representative of the Debtor during the 341 meeting of creditors. A copy of your June 26th letter is attached hereto.

In the first instance, we object to your request for the documents outlined in your letter regarding the two employees of the Debtor who are priests accused of sexual abuse (the "Two Employees"), although in the spirit of cooperation, we provide this preliminary response. Second, as you know, the Two Employees are now represented by Dan Webb and Matthew Carter of Winston & Strawn, who have expressed to the state court that they were engaged to protect the rights of the Two Employees under California privacy law, including with respect to the public naming of the Two Employees. Since your inquiry requests documents regarding these Two Employees including records that may be part of their personnel file(s) and/or otherwise are protected under California law, Messrs. Webb and Carter are copied here.

As an initial response, the Debtor retained outside counsel, led by a former Assistant United States Attorney, to review the allegations against the Two Employees. The Debtor found the allegations were not credible.

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For further response, the Debtor objects to the document requests at this time for reasons which include, but are not limited to, the following:

- (1) the Committee is requesting production of documents by the Debtor which are protected by the attorney-client privilege and/or work product doctrine; and
- (2) the Committee is requesting production of documents by the Debtor concerning the Two Employees which are protected from disclosure by California privacy law; relatedly and because of this, we must provide counsel for the Two Employees notice and the opportunity to state their position regarding the Committee's request for production of documents.

By copy of this to Messrs. Webb and Carter, I request that they provide the undersigned on behalf of the Debtor, and counsel for the Committee, with their position with respect to the requested documents.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ann Marie Uetz', with a stylized, flowing script.

Ann Marie Uetz

Attachment

cc (each via email): Jeffrey R. Blease, Esq.
Thomas F. Carlucci, Esq.
Matthew Carter, Esq.
Matthew D. Lee, Esq.
Dan Webb, Esq.

June 26, 2023

VIA EMAIL

Foley & Lardner LLP
Ann Marie Uetz, Esq.
auetz@foley.com
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Detroit, MI 48226

Matthew D. Lee, Esq.
mdlee@foley.com
150 East Gilman Street, Suite 5000
Madison, WI 53703

**Re: *In re The Roman Catholic Bishop of Oakland, Case No. 23-40523 (WJL)*
Employment of Priests Accused of Sexual Abuse**

Dear Ann Marie and Matt:

As you know, this firm represents the Official Committee of Unsecured Creditors (the “Committee”) of the Roman Catholic Bishop of Oakland (the “Bishop”) in the above-reference chapter 11 case. At the Rule 341(a) Meeting of Creditors held on June 21, 2023, it was disclosed that the Bishop employs two priests accused of having sexually abused children (the “Employed Accused Priests”). Under the “*Policy of the Diocese of Oakland Regarding Sexual Misconduct*” (the “Sexual Abuse Policy”) found on the diocese website, the Bishop committed to address “all reported allegations of sexual misconduct by clerics or diocesan employees in a prompt, comprehensive, and pastoral manner.” To that end, the diocese website, at <https://oakdiocese.org/victims-assistance>, sets forth 8 steps the diocese will take when it receives an allegation that a priest or deacon sexually abused a child.

In light of the foregoing, and the Committee’s authority to “investigate the acts [and] conduct ... of the debtor [and] the operation of the debtor’s business ... and any other matter relevant to the case or to the formulation of a plan,” the Committee requests that the Bishop immediately, and ***no later than Friday, June 30, 2023***, produce to the Committee all documents concerning the allegations made against the Employed Accused Priests and the Bishop’s response to same, including, but not limited to, the Employed Accused Priests’ priest or personnel file and all documents concerning:

1. the allegations made against the Employed Accused Priests;
2. the actions taken by the Bishop to comply with the Sexual Abuse Policy;

3. the actions taken by the Bishop to notify law enforcement and all communications with law enforcement with respect thereto;
4. the actions taken by the Bishop to place the Employed Accused Priests on a temporary suspension of all ministry and all communications with respect thereto;
5. the actions taken by the Bishop to communicate with a parish and others regarding the suspension of the Employed Accused Priests;
6. the actions taken by the Bishop to retain an independent private investigator to conduct an investigation and report findings to the Bishop and the Diocesan Review Board and all communications with the private investigator, including any reports issued by the private investigator;
7. The Diocesan Review Board's review of the independent private investigator's report and its recommendation to the Bishop;
8. the Bishop's determination if the allegations made against the Employed Accused Priests was substantiated or not; and
9. the Bishop's determination to continue the Employed Accused Priests' employment.

The Committee reserves all of its rights, none of which are waived.

Very truly yours,

/s/ Brent Weisenberg
Brent Weisenberg, Esq.

Enclosure

CC: Jeffrey R. Blease, Esq
Thomas F. Carlucci, Esq
Jeffrey Prol, Esq.
Michael Kaplan, Esq.
Colleen M. Restel, Esq.